

ESTTA Tracking number: **ESTTA816442**

Filing date: **04/24/2017**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91226617
Party	Plaintiff Niagara LaSalle Corporation
Correspondence Address	DENNIS S PRAHL LADAS & PARRY LLP 1040 AVENUE OF THE AMERICAS NEW YORK, NY 10018-3738 UNITED STATES DPrahl@ladas.com, jkwon@ladas.com, DRobertson@ladas.com, rcathcart@ladas.com, rroa@ladas.com
Submission	Stipulated/Consent Motion to Extend
Filer's Name	Jennifer Kwon
Filer's e-mail	DPrahl@ladas.com, jkwon@ladas.com, DRobertson@ladas.com, rcathcart@ladas.com, rroa@ladas.com
Signature	/Jennifer Kwon/
Date	04/24/2017
Attachments	Motion on Consent for 30 Day Extension of Deadlines for Answer to Counter-claim Discovery and Trial for Stressbar.pdf(612956 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

-----X	:	
NIAGARA LASALLE CORPORATION,	:	
	:	
Opposer/Counterclaim Defendant,	:	Opposition No. 91226617
	:	Application No. 86/189,035
v.	:	
	:	
STRESSBAR SYSTEMS INTERNATIONAL	:	
LIMITED LIABILITY COMPANY,	:	
	:	
Applicant/Counterclaim Plaintiff.	:	
-----X	:	

**MOTION ON CONSENT FOR EXTENSION OF DEADLINES FOR
ANSWER TO COUNTERCLAIM, DISCOVERY AND TRIAL**

The deadline for Opposer/Counterclaim Defendant Niagara Lasalle Corporation to Answer the Counterclaim is currently set for April 27, 2017. Opposer/Counterclaim Defendant respectfully requests, with Applicant/Counterclaim Plaintiff Stressbar Systems International Limited Liability Company's consent, that such date be extended by thirty (30) days, or until May 27, 2017, and that all subsequent dates be reset accordingly as follows:

Answer to Counterclaim Due:	05/27/2017
Deadline for Discovery Conference:	06/26/2017
Discovery Opens:	06/26/2017
Initial Disclosures Due:	07/26/2017
Expert Disclosures Due:	11/23/2017
Discovery Period to Close:	12/23/2017
Plaintiff Pretrial Disclosures:	02/06/2018
Plaintiff's 30-day Trial Period Ends:	03/23/2018

Defendant/Counterclaim Plaintiff's Pretrial Disclosures:	04/07/2018
30-day Trial Period for Defendant and Plaintiff in the Counterclaim:	05/22/2018
Counterclaim Defendant's and Plaintiff's Rebuttal Disclosures Due:	06/06/2018
30-day Trial Period for Counterclaim Defendant and Rebuttal Testimony as Plaintiff Ends:	07/21/2018
Counterclaim Plaintiff's Rebuttal Disclosures Due:	08/05/2018
15-day Rebuttal Period for Counterclaim Plaintiff Ends:	09/04/2018
Plaintiff's Trial Brief Due:	11/03/2018
Defendant's Trial Brief and Plaintiff in the Counterclaim Due:	12/03/2018
Brief for Defendant in the Counterclaim and Reply Brief, if any, for Plaintiff Due:	01/02/2019
Reply Brief, if any, for Plaintiff in the Counterclaim Due:	01/17/2019

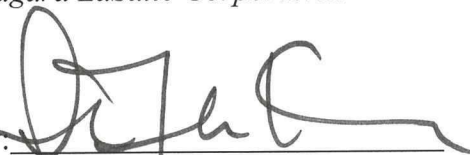
The additional time is requested because the parties are engaged in settlement negotiations.

Applicant/Counterclaim Plaintiff's attorney, Joel G. MacMull, Esq., has consented to this request.

Respectfully submitted,
LADAS & PARRY LLP

*Attorneys for Opposer/Counterclaim Defendant
Niagara LaSalle Corporation*

Dated: April 24, 2017

By: 
Dennis Prahl
Jennifer Kwon
1040 Avenue of the Americas
New York, NY 10018-3738
Tel: (212) 708-1817
(Our Ref: C15672727)

CERTIFICATE OF TRANSMISSION

I, Reinaldo M. Roa, hereby certify that a copy of the foregoing **MOTION ON CONSENT FOR EXTENSION OF DEADLINES FOR ANSWER TO COUNTERCLAIM, DISCOVERY AND TRIAL** is being electronically transmitted to the United States Patent and Trademark Office on the date indicated:

Dated: April 24, 2017


Reinaldo Roa

CERTIFICATE OF SERVICE

I, Reinaldo M. Roa, hereby certify that a copy of the foregoing **MOTION ON CONSENT FOR EXTENSION OF DEADLINES FOR ANSWER TO COUNTERCLAIM, DISCOVERY AND TRIAL** was served on the person(s) listed below email on the date indicated:

Joel G. MacMull
Archer & Greiner PC
21 Main Street, Suite 353
Hackensack, NJ 07601

E-mail: jmacmull@archerlaw.com, ksozio@archerlaw.com

Dated: April 24, 2017


Reinaldo Roa